

**Granted.**

12:18 PM, Oct 30, 2020

**IN THE UNITED STATES DISTRICT  
COURT SOUTHERN DISTRICT OF  
OHIO**



**Chinedum Ndukwe, et al.**

**Plaintiffs,**

**vs.**

**James L. Walker, et al.**

**Defendants.**

**: Case No. 1:20-cv-00790**  
**:**  
**: JUDGE MATTHEW W. MCFARLAND**  
**:**  
**: MAGISTRATE JUDGE KAREN L.**  
**: LITKOVITZ**  
**:**  
**: MOTION FOR LEAVE TO FILE**  
**: MEMORANDUM IN SUPPORT OF**  
**: PLAINTIFFS' MOTION TO REMAND**  
**: FOR LACK OF SUBJECT MATTER**  
**: JURISDICTION AND FOR**  
**: ATTORNEYS' FEES AND COSTS IN**  
**: EXCESS OF TWENTY (20) PAGES**

Plaintiffs, Chinedum Ndukwe and Kingsley Consulting, LLC ("Plaintiffs"), through counsel, pursuant to S.D. Ohio Local R. 7.2(a)(3), respectfully request leave to file Plaintiffs' Motion To Remand For Lack Of Subject Matter Jurisdiction And For Attorneys' Fees and Costs ("Motion To Remand") in excess of twenty (20) pages. The Motion is supported by S.D. Ohio Local R. 7.2(a)(3) and the within memorandum. (Proposed Order attached hereto).

Respectfully submitted,

/s/ John L. O'Shea

John L. O'Shea (0042291)

Jill T. O'Shea (0034692)

COHEN, TODD, KITE & STANFORD,  
LLC

250 East Fifth Street, Suite 2350

Cincinnati, Ohio 45202

PH: 513-421-4020

Fax: 513-241-4490

E-mail: [joshea@ctks.com](mailto:joshea@ctks.com)

[jilloshea@ctks.com](mailto:jilloshea@ctks.com)